



February 7, 2003

EPA Region 5 Records Ctr.



226788

Ms. Verneta Simon, On-Scene Coordinator  
Mr. Fred Micke, On-Scene Coordinator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Blvd., SE-5J  
Chicago, Illinois 60604

RE: Clarification of Request for USEPA Sign-off on Removal Verification for South Slip Area of Lakeshore East, 221 North Columbus Drive, Chicago, Illinois - STS Project Number 1-32193-XC

Dear Ms. Simon and Mr. Micke:

Please recall that in correspondence dated November 6, 2002, STS Consultants, Ltd. (STS) on behalf of Lakeshore East Development, LLC, provided information on an area within the South Slip of the Lakeshore East development site where evidence was detected of radiological impacts in soil below the groundwater table. That area was excavated to several feet below the water table, and four casings were installed and surveyed to assess whether radiological impacts remained. Recent correspondence from USEPA dated January 24, 2003, indicates your review of the data provided by STS shows no radiological impacts above the cleanup level.

The objective of this letter is to clarify the sign-off requested from USEPA with regard to the previous detections of radiological impacts at that location.

The approved Work Plan, Figure 1, recognizes two different types of areas within the subject site. The majority of the site is underlain by fill placed prior to 1900, thus pre-dating the potential placement of Lindsay Light materials. In accordance with the Work Plan, those portions of the site underlain by pre-1900 fill can achieve closure sign-off from USEPA that all contamination has been removed by providing survey results for the excavations down to the 1900 elevation.

The site also includes several areas that were shipping slips in the early 1900s. Those slips were filled between 1906 and 1929. Site-wide gamma survey results show the impacted materials found at the site are closely associated with the previous locations of the slips (refer to Work Plan Figure 1). An extensive drilling program within the slips, Work Plan Figure 2, explored the upper approximately 12 feet of the fill to identify potentially impacted material for removal. Deeper exploration was not pursued due to the fact that deeper removal is constrained by the difficulty in excavation below the water table because of slope stability considerations. USEPA closure sign-off in the slip areas is to be limited to the verification that the identified impacted material has been removed to below the cleanup threshold. The sign-off will not indicate that all contamination has been removed due to the acknowledged limitations of the drilling and survey exploration of the slip areas. Further, any future construction excavation within the slip areas will require radiation monitoring, in accordance with the Work Plan.

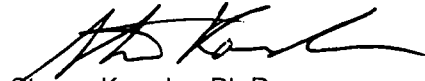
With specific regard to the area in the South Slip where the radiologically impacted material was found to extend below the water table, we are seeking the slip area sign-off as described above. The exploration following the removal effort found no further evidence of contamination above the cleanup threshold. On this basis, we are requesting sign-off that all identified contamination has been removed. It is acknowledged that the previously agreed to administrative controls applicable to the slip areas will apply and future excavations of historical fill in this slip will require radiation monitoring. No variance from the routine sign-off and monitoring obligations specified in the Work Plan is requested as part of the resolution of this specific location closure.

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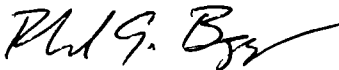
We request your review of this request and further, your sign-off on the specific location in the south slip that remains open. We appreciate your prompt attention to this matter as the area is due to be impacted by construction activities in the near future. Please contact us with any questions you may have regarding this matter.

Regards,

STS CONSULTANTS, LTD.



Steven Kornder, Ph.D.  
Senior Project Chemist



Richard G. Berggreen, C.P.G.  
Principal Geologist

cc: David Carlins, Lakeshore East Development, LLC  
Kara Hughes, Lakeshore East Development, LLC